

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff, 12 Civ. 6421 (KMK)

v.

**EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL**

Defendants

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

**DECLARATION OF MAUREEN PEYTON KING IN SUPPORT OF
PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE WHY
DEFENDANT EDWARD BRONSON AND DAWN BRONSON SHOULD
NOT BE HELD IN CIVIL CONTEMPT AND FOR TURNOVER**

I, Maureen Peyton King, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a senior trial counsel employed by the Securities and Exchange Commission (the "Commission") in its New York Regional Office. I am a member of the bar of this Court. I am personally familiar with the facts set forth herein.

2. I make this declaration in support of the Commission's motion for an order to show cause why Edward Bronson ("Bronson") and Dawn Bronson should not be held in civil contempt and for turnover of certain funds.

3. The Amended Judgment, Docket Entry 193, imposed on Bronson and E-Lionheart Associates LLC, a joint and several obligation to pay disgorgement of \$9,355,271.79 and prejudgment interest of \$2,177,100.59 and on Bronson, E-Lionheart Associates LLC and a relief defendant, Fairhills Capital, a joint and several obligation to pay disgorgement of \$645,000.00

and prejudgment interest thereon in the amount of \$151,031.37. Bronson continues to owe the SEC around \$10 million dollars.

4. Accompanying this declaration is a series of exhibits. The following table lists the exhibits, each of which is a true and correct copy of the document described, with redactions as required and for sensitive information:

Exhibit #	Description
1	July 6, 2021 Hearing transcript excerpts.
2	November 22, 2021 Hearing transcript excerpts.
3	December 12, 2022 Hearing transcript excerpts.
4	Dec. 12, 2022 Hearing exhibit 124 – Rachmuth’s purported loan ledger for \$250,000 loan to Bronson.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Wantagh, New York, on February 2, 2023.

s/Maureen Peyton King
Maureen Peyton King